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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 JULIE HANNA,)
9 vs.) Plaintiff,) Case No.: 2:21-cv-00639-JCM-BNW
10)
11 K-KEL, INC.. a Nevada Corporation;; DOES I-)
12 X; and, ROE Business Entities I-X, Mark)
13 Broadhurst, Mike York, and Chase Swanson.)
14 Defendants.)
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**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR EXPERT
DISCLOSURES**

[First Request]

Pursuant to Local Rules 6-1 Defendant K-Kel, Inc. (“Defendant”) and Plaintiff Julie Danou aka Julie Hanna (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to amend the Discovery Plan and Scheduling Order (ECF No. 21) by extending the outstanding deadline for expert disclosures by a period of twenty-one (21) days. This is the first request for an extension to the discovery plan and scheduling order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This extension will not affect the remaining discovery deadlines.

DISCOVERY COMPLETED TO DATE

The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff has served written discovery upon the Defendant, and Defendant’s responses are due by September 15, 2021.

1 **DISCOVERY REMAINING**

2 The Defendant will need to serve written discovery and both parties will need to conduct
3 depositions, and further fact discovery. Discovery from third-parties may also be necessary.
4

5 **REASON FOR EXTENSION OF DISCOVERY**

6 This extension is necessary to allow the parties' experts sufficient time to complete reports
7 for the disclosure deadline.

8 **PROPOSED REVISED DISCOVERY PLAN**

9 1. Deadlines for Expert Disclosures

10 The deadline for the Parties to make expert disclosures shall be extended by 21 days
11 from September 13, 20201 to October 4, 2021. The deadline to disclose rebuttal expert,
12 if any, shall similarly be extended by 21 days, from October 13, 2021 to November 3,
13 2021. There are no other proposed changes to the discovery plan.

14 Respectfully submitted,

15 DATED 9/10/2021

16 /s/ James P. Kemp
17 JAMES P. KEMP, ESQUIRE
18 Nevada Bar No. 006375
19 Attorney for Plaintiff

20 Allison Kheel
21 ALLISON KHEEL, ESQUIRE
22 Nevada Bar No.
23 Attorney for Defendant

24 **ORDER**

25 IT IS SO ORDERED.

26 
27 UNITED STATES MAGISTRATE JUDGE

28 Dated: September 13, 2021.